

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ROBERTO ALMODOVAR, JR.)	
)	Case No. 18 CV 2341
Plaintiff,)	
)	Judge Joan B. Gottschall
)	
vs.)	
)	
)	
REYNALDO GUEVARA, et al.)	
)	
Defendants.)	

WILLIAM NEGRON)	
)	Case No. 18 CV 2701
Plaintiff,)	
)	Judge Joan B. Gottschall
)	
vs.)	
)	
)	
REYNALDO GUEVARA, et al.)	
)	
Defendants.)	

DEFENDANTS' MOTION FOR LEAVE TO CITE SUPPLEMENTAL AUTHORITY

Defendants Edward Mingey, Mark Olszewski, JoAnn Halvorsen as Special Representative for Ernest Halvorsen, deceased, Reynaldo Guevara, and the City of Chicago (collectively "Defendants"), by and through their respective attorneys, move for leave to cite supplemental authority supporting their Response in Opposition to the Cook County State's Attorney's Office's ("CCSAO") Motion to Quash Subpoena for the Deposition of Eric Sussman, and in support state:

1. On June 22, 2021, the CCSAO filed its motion to quash Defendants’ subpoena for the deposition of Eric Sussman. That motion is fully briefed and pending before this Court. *See* Almodovar Dkt Nos. 138, 143, 149.

2. Also on June 22, 2021, the CCSAO filed a nearly identical motion to quash the subpoena for the deposition of Mr. Sussman in another set of actions in this District—*Solache-Reyes*¹—wherein many of the defendants, defendants’ counsel, and plaintiffs’ counsel are the same as they are in the instant actions.

3. On July 22, 2021, in *Solache-Reyes*, Magistrate Judge Harjani granted in part and denied in part the CCSAO’s motion to quash the subpoena for the deposition of Mr. Sussman. *See* Ex. A, Order, *Reyes* Dkt. No. 457.

4. As the motion to quash in *Solache-Reyes* applied to many of the same parties as in the instant actions, and to a similar level of involvement by Mr. Sussman as in the instant actions—which, here, Defendants argued in their motion warranted the taking of the deposition of Mr. Sussman—Defendants bring this recent ruling to the Court’s attention.

5. Counsel for the CCSAO has no objection to this motion.

WHEREFORE, Defendants respectfully request that this Court grant their motion for leave to cite the supplemental authority of *Solache-Reyes*.

¹ *DeLeon-Reyes v. Guevara, et al.*, No. 18 CV 1028 (N.D. Ill.); *Solache v. City of Chicago, et al.*, No. 18 CV 2312 (N.D. Ill.).

Date: July 28, 2021

Respectfully submitted,

/s/ Samantha J. Pallini

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CERTIFICATE OF SERVICE

I certify under penalty of perjury, pursuant to 28 U.S.C.A. § 1746, that on **Wednesday, July 28, 2021**, I electronically filed the foregoing **Defendants' Motion for Leave to Cite Supplemental Authority** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following CM/ECF participants listed in the below service list:

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